

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

No. 19-cv-2913-WHO

This Document Relates to:
GOVERNMENT ENTITY CASES

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES
FOR FILING GOVERNMENT ENTITY
CASE SCHEDULE AND CASE
SPECIFIC REPORTS**

1 As indicated in the December 2, 2021 Joint Case Management Conference Statement
2 Proposed Agenda, the parties are meeting and conferring regarding Plaintiffs' request to extend
3 the deadline for case-specific expert reports, as well as the schedule for the remaining pre-trial
4 bellwether deadlines, in the government entity cases. As the parties are continuing to engage in
5 productive meet and confers, the parties jointly stipulate and agree, subject to the Court's
6 approval, to a one week extension of the deadlines to submit either an agreed upon schedule or
7 competing schedules—thus extending the deadline from December 10, 2021 to December 17,
8 2021. In the interim, the parties have agreed, and propose to the Court, extending the deadline for
9 serving case-specific expert reports until January 14, 2022 and the deadline for serving case-
10 specific rebuttal reports until February 25, 2022.
11

12 WHEREAS, on December 2, 2021, the parties jointly stipulated and agreed to a deadline
13 of December 10, 2021 to submit either an agreed upon schedule or competing schedules;
14

15 WHEREAS, on December 2, 2021, the parties jointly stipulated and agreed to extending
16 the deadline for serving case-specific expert reports until January 7, 2022 and the deadline for
17 serving case-specific rebuttal reports until February 18, 2022, while the parties continued to
18 discuss an appropriate schedule for the remaining pre-trial bellwether deadlines in the
19 government entity cases;
20

21 WHEREAS, the parties are continuing to engage in productive meet and confers and an
22 additional week would better position the parties to finish meeting and conferring and attempt to
23 reach agreement on the schedule;

24 WHEREAS, the parties now agree to extend the deadline for serving case-specific expert
25 reports until January 14, 2022 and the deadline for serving case-specific rebuttal reports until
26 February 25, 2022, while the parties continue to discuss an appropriate schedule;

NOW THEREFORE, the parties, through their undersigned counsel, hereby stipulate, agree and respectfully request that the Court enter an Order establishing a deadline of December 17, 2021 for the parties to submit either an agreed upon schedule or competing schedules, a deadline of January 14, 2022 to submit government entity case-specific expert reports, and a deadline of February 25, 2022 to submit government entity case-specific expert rebuttal reports.

Event	Current Date	Proposed New Date
<u>GE</u> : Deadline to submit either an agreed upon schedule or competing schedules	December 10, 2021	December 17, 2021
<u>GE</u> : Case specific expert reports for BW cases exchanged	January 7, 2022	January 14, 2022
<u>GE</u> : Case specific rebuttal reports for BW cases exchanged	February 18, 2022	February 25, 2022

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Date: December 13, 2021



HONORABLE WILLIAM H. ORRICK
United States District Judge

RESPECTFULLY SUBMITTED this 13th day of December, 2021.

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CERTIFICATE OF SERVICE

I, Dean N. Kawamoto, hereby certify that on December 13, 2021, I electronically filed
**STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR FILING
GOVERNMENT ENTITY CASE SCHEDULE AND CASE SPECIFIC REPORTS** with the
Clerk of the United States District Court for the Northern District of California using the
CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Dean N. Kawamoto

Dean N. Kawamoto